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May 26, 2017

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VIA ECF

Honorable Vincent L. Briccetti
United States District Court Judge
United States Courthouse - Southern District of New York
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: Letter Motion Pursuant to Local Rule 1-B and 1-F To Set A Status Conference and Stay Defendant's Time To Answer, Move, or Otherwise Respond to The Complaint, *Mayhew, et al. v. KAS Direct, LLC*, Case No. 7:16-cv-06981-VB (SDNY)

Dear Judge Briccetti:

We represent Defendant KAS Direct, LLC ("KAS") in the above-captioned matter, and respectfully submit this letter on behalf of both parties.

Consistent with Your Honor's Individual Practices, we write to respectfully request a status conference. The parties are available on June 5, June 12, June 13, or June 16.

The parties also request a stay of Defendant's response deadline, currently set for Tuesday, May 30, 2017, to be reset at the status conference. In its April 27, 2017 Order granting a prior request to extend Defendant's response deadline, the Court advised the parties that it would not grant any further extensions "absent a detailed explanation of the reasons for same." (Dkt. No. 24.) The parties have requested the status conference because they believe it will permit them to fully explain why they believe the requested stay is in the best interest of the Court and the parties, and to provide a detailed report on the status of the case.

Four prior unopposed requests for extension or continuance have been made in this matter, for the same reasons stated above, which the Court granted. (Dkt. Nos. 14, 17, 19, and 24.) Plaintiffs' counsel have reviewed this request and consent to its filing. We appreciate the Court's consideration of the request.

Page 2

Respectfully submitted,

/s/ Hannah Y. Chanoine

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